

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	No. CR-24-467-SLP
)	
NASIR AHMAD TAWHEDI,)	
a/k/a Nasir Ahmad Tawhedi,)	
a/k/a “@Abu_Omir,”)	
)	
Defendant.)	

JOINT MOTION FOR SCHEDULING ORDER

The United States and Defendant jointly move this Court for a scheduling order to accommodate the anticipated litigation under the Classified Information Procedures Act (“CIPA”), 18 U.S.C. App. III, § 1 *et seq.*

The United States and Craig Hoehns, counsel for Defendant, have conferred about these proposed deadlines. The extended trial setting and intermediate deadlines are necessary for the parties to review the voluminous evidence, litigate CIPA issues, litigate other pretrial matters, and prepare for trial.

The United States has produced extensive discovery to the Defendant as it has become available. To date, the United States has produced six rounds of discovery containing more than 25,000 pages of documents, and

voluminous audio and video recordings. Counsel for the United States has been informed by FBI that the majority of the remaining discovery, including summary translations of electronic devices, will be completed by the end of March.¹ Accordingly, the parties respectfully request that the Court enter a scheduling order reflecting the following schedule:

1. June 13, 2025: Deadline for United States' sealed, *ex parte* CIPA Section 4 filing to the Court.
2. July 11, 2025: Deadline for Defendant's CIPA Section 5(a) Notice to the United States and the Court.
3. August 15, 2025: Fed. R. Crim. P. 12(b)(3) pretrial motions and Fed. R. Crim. P. 12.2 notice deadline and expert witnesses notice and report deadline (both parties).
4. September 19, 2025: Response deadline to Fed. R. Crim. P. 12(b)(3) pretrial motions and Fed. R. Crim. P. 12.2 notice.
5. September 26, 2025: Daubert motions deadline.
6. October 3, 2025: Reply deadline, with leave of Court, to Fed. R. Crim. P. 12(b)(3) pretrial motions and Fed. R. Crim. P. 12.2 notice.
7. October 31, 2025: Daubert response deadline.
8. November 14, 2025: Daubert reply deadline, with leave of Court.
9. December 2025 – January 2026: Hearings on outstanding motions (to be determined by the Court).

¹ Verbatim translations of any material the United States intends to introduce will take longer but will be provided prior to jury trial.

10. January 23, 2026: Fed. R. Crim. P. 404(b) notices; motions in limine; proposed jury instructions; proposed voir dire; disclosure of witness and exhibit lists deadline.
11. February 20, 2026: Response deadline to Fed. R. Crim. P. 404(b); motions in limine; objections to jury instruction; voir dire; witness and exhibit lists.
12. March 6, 2026: Reply deadline, with leave of the Court, to Fed. R. Crim. P. 404(b); motions in limine; objections to jury instruction; voir dire; witness and exhibit lists.
13. March 20, 2026: Hearings on motions in limine, Fed. R. Crim. P. 404(b) notices, and jury instructions, and proposed voir dire.
14. April 10, 2026: Jencks Act and Giglio Disclosures.
15. April 24, 2026: Pretrial conference.
16. May 4, 2026: Jury trial for approximately two weeks.

The extended trial setting and intermediate deadlines are necessary for the parties to review the voluminous evidence, litigate CIPA issues, litigate other pretrial matters, and prepare for trial. The United States and Craig Hoehns, counsel for Defendant, have conferred and agree to these proposed deadlines.

WHEREFORE, the United States and Defendant respectfully submit this Joint Motion for Scheduling Order and request that the Court enter a scheduling order reflecting these proposed dates.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on February 11, 2025, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:
Craig M. Hoehns

s/Matt Dillon

Assistant U.S. Attorney